

1 THEODORE PARKER, III, ESQ.  
Nevada Bar No. 4716  
2 **PARKER, NELSON & ASSOCIATES, CHTD.**  
2460 Professional Court, Suite 200  
3 Las Vegas, Nevada 89128  
Telephone: (702) 868-8000  
4 Facsimile: (702) 868-8001  
Email: [tparker@pnalaw.net](mailto:tparker@pnalaw.net);

5 *Attorneys for Defendant,*  
6 *Zurich American Insurance Company*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 MGM RESORTS INTERNATIONAL and  
MANDALAY BAY, LLC, and MANDALAY  
11 RESORTS GROUP, and MGM RESORTS  
FESTIVAL GROUNDS, LLC and MGM  
12 RESORTS VENUE MANAGEMENT, LLC,

13 Plaintiffs,

14 vs.

15 ZURICH AMERICAN INSURANCE  
COMPANY,

16 Defendant.

**CIVIL ACTION NO. 2:19-cv-01051-JCM-NJK**

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE ANSWER  
(FOURTH REQUEST)**

17 IT IS HEREBY STIPULATED between Plaintiffs, MGM RESORTS INTERNATIONAL,  
18 MANDALAY BAY, LLC, MANDALAY RESORTS GROUP, MGM RESORTS FESTIVAL  
19 GROUNDS, LLC, and MGM RESORTS VENUE MANAGEMENT, LLC (hereinafter collectively  
20 referred to as “Plaintiffs”), by and through their counsel of record, Lawrence J. Semenza III, Esq. of  
21 Semenza Kircher Rickard, and Defendant, ZURICH AMERICAN INSURANCE COMPANY  
22 (hereinafter “Defendant”), by and through its counsel of record, Theodore Parker, III, of Parker,  
23 Nelson & Associates, Chtd., that Defendant shall file an answer, or otherwise respond to Plaintiffs’  
24 Complaint on or before November 15, 2019.

25 This is the fourth request made for an extension of time to file a responsive pleading. The  
26 first request was denied, without prejudice, for failure to provide the reason an extension was  
27 requested (Doc No. 13). The second request was granted (Doc No. 17). The third request was granted  
28 (Doc. No. 19). The parties are seeking an extension as they are engaged in settlement discussions

1 which may alleviate the need to file a responsive pleading. The settlement discussions are taking  
2 longer than anticipated to complete. However, progress has been made and a further extension will  
3 allow the negotiations to continue and hopefully resolve this matter in its entirety.

4 Dated this 29<sup>th</sup>, day of October, 2019.

Dated this 29<sup>th</sup>, day of October, 2019.

5 **SEMENZA KIRCHER RICKARD**

**PARKER, NELSON & ASSOCIATES,  
CHTD.**

6  
7 /s/Jerrod L. Rickard, Esq.

/s/Theodore Parker, III, Esq.

8 LAWRENCE J. SEMENZA, III, ESQ.

THEODORE PARKER, III, ESQ.

9 Nevada Bar No.: 7174

Nevada Bar No. 4716

10 JERROD L. RICKARD, ESQ.

2460 Professional Court, Suite 200

11 Nevada Bar No.: 10203

Las Vegas, Nevada 89128

12 10161 Park Run Drive, Suite 150

Telephone: (702) 868-8000

13 Las Vegas, Nevada 89145

Facsimile: (702) 868-8001

14 Telephone: (702) 835-6803

Email: [tparker@pnalaw.net](mailto:tparker@pnalaw.net);

15 Email: [jlr@skrlawyers.com](mailto:jlr@skrlawyers.com);

*Attorneys for Defendant,*

16 [jlr@skrlawyers.com](mailto:jlr@skrlawyers.com)

*Zurich American Insurance Company*

17 *Attorneys for Plaintiffs,*

18 *MGM Resorts International, Mandalay Bay*

19 *LLC, Mandalay Resorts Group, MGM*

20 *Resorts Festival Grounds, LLC and MGM*

21 *Resorts Venue Management, LLC*

## 22 ORDER

23 Defendants shall have until November 15, 2019 to file an answer or responsive pleading.

24 IT IS SO ORDERED.

25  
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: \_\_\_\_\_